



January 16, 2018

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101



WA 3019
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1/16/2018

**Subject: December 2017 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the December 2017 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from December 15, 2017, to January 14, 2018.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- A site visit was conducted on 1/5/2018 to place EW-4 back in service. At this time, EW-1, EW-2, EW-4 and EW-5 are pumping at a combined rate of 45-50 gpm. EW-3 has electrical issues that will need additional attention by a panel or electrical specialist.
- The SADD report for 2017 was submitted to EPA December 28, 2017.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period. The iSOCs will have the oxygen replaced and we will schedule a specialist to review the EW-3 pump and panel electrical issue.
- The data for the fourth quarter sampling will be received and validation will be conducted over the next 2 months.
- The CMS Version 4 was submitted during the First Quarter 2017. We anticipate comments from EPA.



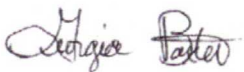
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Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



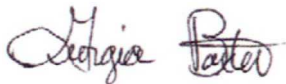
Name: Georgia Baxter

Title: Chief Executive Officer

Date: January 16, 2018

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Chris Martin, Ecology
Jamie Hillery, Stella-Jones Corp.



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